

IN THE DISTRICT COURT OF THE UNITED STATES
 DISTRICT OF SOUTH CAROLINA
 CHARLESTON DIVISION

UNITED STATES OF AMERICA)	Criminal Number 2:15- <i>Cr-800</i>
)	
)	21 USC § 841(a)(1)
-versus-)	21 USC § 841(b)(1)(A)
)	21 USC § 841(b)(1)(C)
)	21 USC § 846
)	18 USC § 2
ROBERTO BROWN)	
a/k/a “AB”)	
DANIEL LITTLE)	INDICTMENT
a/k/a “Daru”)	(UNDER SEAL)

COUNT 1

THE GRAND JURY CHARGES:

That beginning at least in or around January 2012, and continuing thereafter, up to and including the date of this Indictment, in the District of South Carolina and elsewhere, the Defendants, **ROBERTO BROWN, a/k/a “AB,”** and **DANIEL LITTLE, a/k/a “Daru,”** knowingly and intentionally did combine, conspire and agree and have tacit understanding with each other and others, both known and unknown to the grand jury, to possess with intent to distribute and distribute cocaine, a Schedule II controlled substance:

- a. With respect to **ROBERTO BROWN, a/k/a “AB,”** the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators reasonably foreseeable to him, is 5 kilograms or more of cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);
- b. With respect to **DANIEL LITTLE, a/k/a “Daru,”** the amount involved in the conspiracy attributable to him as a result of his own conduct, and the conduct of other conspirators

reasonably foreseeable to him, is 5 kilograms of cocaine, in violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(A);

All in violation of Title 21, United States Code, Section 846.

COUNT 2

THE GRAND JURY FURTHER CHARGES:

That on or about June 26, 2013, in the District of South Carolina, the Defendant, **DANIEL LITTLE, a/k/a “Daru,”** knowingly and intentionally did possess with intent to distribute and did distribute a quantity of cocaine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

COUNT 3

THE GRAND JURY FURTHER CHARGES:

That on or about August 14, 2013, in the District of South Carolina, the Defendant, **DANIEL LITTLE, a/k/a “Daru,”** as a principal, aider and abettor and as a co-participant in jointly undertaken criminal activity, knowingly and intentionally did possess with intent to distribute and did distribute a quantity of cocaine, a Schedule II controlled substance;

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

A TRUE BILL



WILLIAM N. NETTLES (nb)
UNITED STATES ATTORNEY

[REDACTED]
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